

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: BOSTON SCIENTIFIC CORP.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL No. 2326

THIS DOCUMENT RELATES TO:

KATHERINE L. HALL
CAROLYN FRANCES SMOTHERS

2:12-cv-08186
2:12-cv-08016

**DEFENDANT BOSTON SCIENTIFIC CORPORATION'S MOTION TO EXCLUDE
THE OPINIONS AND TESTIMONY OF VLADIMIR IAKOVLEV, M.D.**

Defendant Boston Scientific Corporation ("Boston Scientific") hereby respectfully moves this Court pursuant to Federal Rules of Evidence 702, 403, and 104 as well as the U.S. Supreme Court's decision in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), to exclude the opinions and testimony offered by Plaintiffs' retained expert Vladimir Iakovlev, M.D.

For the reasons set forth more fully in Boston Scientific's Memorandum in Support of its Motion to Exclude the Opinions and Testimony of Vladimir Iakovlev, M.D., filed concurrently herewith, and the Exhibits attached hereto, the Court should grant Boston Scientific's Motion.

Dated: January 27, 2014

Respectfully submitted,

By: /s/ Jon A. Strongman
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CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2014 I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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